

LARRY W. McFARLAND (State Bar No. 129668)
lmcfarland@kilpatricktownsend.com
EMIL W. HERICH (State Bar No. 116783)
eherich@kilpatricktownsend.com
CHRISTOPHER T. VARAS (State Bar No. 257080)
cvaras@kilpatricktownsend.com
KOLLIN J. ZIMMERMANN (State Bar No. 273092)
kzimmermann@kilpatricktownsend.com
KILPATRICK TOWNSEND & STOCKTON LLP
9720 Wilshire Boulevard, Penthouse Suite
Beverly Hills, California 90212
Telephone: (310) 248-3830
Facsimile: (310) 860-0363

RYAN T. BRICKER (State Bar No. 269100)
rbricker@kilpatricktownsend.com
KILPATRICK TOWNSEND & STOCKTON LLP
Eighth Floor, Two Embarcadero Center
San Francisco, California 94111
Telephone: (415) 576-0200
Facsimile: (415) 576-0300

Attorneys for Plaintiff
INSTAGRAM, LLC

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

INSTAGRAM, LLC,
a Delaware limited liability company,

Plaintiff,

v.

ZHOU MURONG, an individual; HE GUIHE,
an individual; ZHOU MUFEN, an individual;
and ZHOU MEIFANG, an individual,

Defendants.

Case No. 4:16-cv-00235-HSG

**PLAINTIFF INSTAGRAM, LLC'S
FURTHER STATUS REPORT
REGARDING SETTLEMENT**

Complaint Filed: January 13, 2016
Judge: Honorable Haywood S. Gilliam, Jr.

1 Plaintiff Instagram, LLC (“Instagram”) respectfully submits this status report pursuant to
2 the Court’s Order of November 1, 2017. Dkt. No. 38.

3 As the Court is aware, the parties have executed a settlement agreement to resolve this
4 dispute. One of the terms of the settlement agreement requires that Defendant Zhou Murong
5 transfer numerous infringing domain names to Instagram. In exchange for Zhou Murong’s
6 compliance with the terms of the agreement, Instagram will file a voluntary dismissal of this
7 Action. Zhou Murong has transferred several domain names to Instagram, but there is one
8 remaining domain name that needs to be transferred: <instagram.es>. Instagram is informed that
9 the registrar for this domain name is requesting additional information regarding Zhou Murong’s
10 identification, which must be resolved to complete the transfer of the domain name. The delay
11 appears to have been caused by translation issues relating to Zhou Murong’s identification, and
12 proof of domain name ownership.

13 Instagram is doing everything in its power to expeditiously resolve this issue, but at this
14 point Instagram is dependent upon additional action by the third-party registrar and Zhou Murong
15 to do so. As a result, Instagram is unable to predict when the issue will be resolved, as the
16 necessary steps are beyond its control.

17 Instagram understands that this case has been pending on the Court’s docket for a
18 significant amount of time, and it greatly appreciates the Court’s patience with respect to this
19 matter. Instagram will continue to diligently pursue a final resolution, so that a dismissal can be
20 filed as soon as possible.

21 In light of the circumstances, Instagram respectfully requests a 30-day continuance of the
22 upcoming case management conference, currently set for November 21, 2017 at 2:00 p.m., with
23 the understanding that Instagram will not seek a further continuance if it is unable to resolve this
24 issue by then. If the Court is not inclined to grant the continuance, then Instagram is prepared to
25 attend the conference on Nov. 21 and provide the Court with any additional information it
26 requests.

27 ///

28 ///

1 Dated: November 3, 2017

Respectfully submitted,

2 KILPATRICK TOWNSEND & STOCKTON LLP

3
4 By: /s/ Larry W. McFarland
Larry W. McFarland

5 Kilpatrick Townsend & Stockton LLP
6 Attorneys for Plaintiff
7 INSTAGRAM, LLC
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

13546128V.2